

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JOEL GREENFELD,

Plaintiff,

**ANSWER**

13 cv 1507

-against-

PROFESSIONAL CLAIMS BUREAU, INC.,

Defendant(s).

-----X  
Defendant, PROFESSIONAL CLAIMS BUREAU, INC., by its attorney Mel S. Harris and Associates, LLC, answers plaintiff's complaint as follows:

1. Defendant admits being sued pursuant to the Fair Debt Collection Practices Act, along with State and Municipal statutes, but denies any violation thereof.

2. Defendant admits the allegations contained in paragraph "2" of the complaint.

3. Defendant admits the allegations contained in paragraph "3" of the complaint.

4. Defendant admits the allegations contained in paragraph "4" of the complaint.

5. Defendant admits the allegations contained in paragraph "5" of the complaint.

6. Defendant admits the allegations contained in paragraph "6" of the complaint.

7. Defendant admits sending correspondence to the plaintiff, but denies knowledge or information sufficient to form a belief as to the date that plaintiff received the correspondence.

8. Defendant admits the allegations contained in paragraph "8" of the complaint.

9. Defendant denies knowledge or information sufficient to form a belief with respect to the date that plaintiff wrote the letter to the defendant and in addition, defendant denies receiving plaintiff's letter on or about June 5, 2012.

10. Defendant admits sending correspondence to the plaintiff, but otherwise denies knowledge or information sufficient to form a belief with respect to the date plaintiff received such correspondence.

11. Defendant denies each and every allegation contained in paragraph "11" of the complaint.

12. Defendant denies each and every allegation contained in paragraph "12" of the complaint.

13. Defendant denies each and every allegation contained in paragraph "13" of the complaint.

14. Defendant denies each and every allegation contained in paragraph "14" of the complaint.

15. Defendant denies each and every allegation contained in paragraph "15" of the complaint.

16. Defendant denies each and every allegation contained in paragraph "16" of the complaint.

17. Defendant denies each and every allegation contained in paragraph "17" of the complaint.

18. Defendant re-alleges all previous admissions and denials for paragraphs "1" through "17" of the complaint.

19. Defendant denies each and every allegation contained in paragraph "19" of the complaint.

20. Defendant denies each and every allegation contained in paragraph "20" of the complaint.

(continued)

WHEREFORE, the Defendant respectfully requests that plaintiff's complaint be dismissed.

Dated: New York, NY  
April 15, 2013



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